COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

APPLICATION AND NOTICE OF CAMPBELL)
COUNTY KENTUCKY WATER DISTRICT)
(A) TO ISSUE REVENUE BONDS IN THE)
APPROXIMATELY PRINCIPAL AMOUNT OF)
\$5,535,000)
(B) TO CONSTRUCT ADDITIONAL PLANT) CASE NO. 89-029
FACILITIES OF APPROXIMATELY)
\$4,523,000)
(C) NOTICE OF ADJUSTMENT OF RATES)
EFFECTIVE MAY 1, 1989)
(D) SUBMISSION OF LONG-TERM)
WATER SUPPLY CONTRACT

ORDER

IT IS ORDERED that Campbell County Kentucky Water District ("Campbell County") shall file the original and 12 copies of the following information with the Commission, with a copy to all parties of record, not later than 14 days from the date of this Each copy of the data requested should be placed in a Order. bound volume with each item tabbed. When a number of sheets are required for an item, each sheet should be appropriately indexed, for example, Item 1(a), Sheet 2 of 6. Include with each response the name of the witness who will be responsible for responding to questions relating to the information provided. Careful attention should be given to copied material to ensure that it is legible. Where information requested herein has been provided along with original application, in the format requested herein, the reference may be made to the specific location of said information in responding to this information request. If the information cannot be provided by this date, you should submit a motion for an extension of time stating the reason delay is necessary and include a date by which it will be furnished. Such motion will be considered by the Commission.

- 1. a. Provide a list of all outstanding issues of long-term debt as of the end of the test period with the related information as shown in Format la, Schedule 1. A separate schedule is to be provided for each time period. Report in Column (k) of Format la, Schedule 2, the actual dollar amount of debt cost for the test year. Compute the actual and annualized composite debt cost rates and report them in Column (j) of Format la, Schedule 2.
- b. Provide an analysis of end-of-period short-term debt and a calculation of the average and end-of-period cost rates as shown in Format 1b.
- 2. a. Provide a schedule of the present and proposed rates, charges, terms and conditions, and service rates and regulations which the applicant seeks to change, shown in comparative form.
- b. Provide a detailed analysis of customers' bills, adjusted to actual usage and in such detail that the revenues from the present and proposed rates can be readily determined.
- c. Provide a schedule of test-year revenues for each rate schedule per book rates, present rates annualized, and proposed rates annualized.
- d. Provide a schedule setting forth the effect upon average consumer bills.

- e. Provide a statement setting forth estimates of the effect that the new rate or rates will have upon the revenues of the utility, the total amount of money resulting from the increase or decrease and the percentage increase or decrease.
- f. Provide a schedule showing by customer class (i.e., residential, commercial, industrial, etc.) the amount and percent of any proposed increase or decrease in revenue distributed to each class. This schedule is to be accompanied by a statement which explains in detail the methodology or basis used to allocate the requested increase or decrease in revenue to each of the respective customer classes.
- g. Provide a schedule showing how the increase or decrease in (f) above was further distributed to each rate charge (i.e., customer or usage charge per 1000 gallons, etc.). This schedule is to be accompanied by a statement which explains, in detail, the methodology or basis used to allocate the increase or decrease.
- h. Provide a statement showing by cross-outs and italicized inserts all proposed changes in rates, charges, terms and conditions, and service rules and regulations for each rate or charge. Copy of current tariff may be used.
- 3. a. Provide monthly water sales and production for the 12 months of the test period, the 12 months preceding the test period, and the most recent period subsequent to the test period, as shown in Format 2a.

- b. Provide the number of customers and revenue from water sales by month for the same period as 2a, as shown in Format 2b.
- 4. In comparative form, provide an income statement, a statement of changes in financial position, and a balance sheet for the test year and the 12-month period immediately preceding the test year.
- 5. Provide a trial balance as of the last day of the test year (all income statement accounts should show activity for 12 months) showing account number, account title, and amount. Show the balance in each control and all underlying subaccounts per Campbell County's books.
- 6. Provide the following monthly account balances for the test year:
 - a. Plant in service (Account 101).
 - b. Plant purchased or sold (Account 102).
 - c. Property held for future use (Account 105).
 - d. Construction work in progress (Account 107). (Separate this balance into CWIP eligible for capitalized interest and other CWIP.)
 - e. Completed construction not classified (Account 106).
 - f. Depreciation reserve (Account 108).
 - g. Plant acquisition adjustment (Account 114).
 - h. Amortization of utility plant acquisition adjustment (Account 115).
 - i. Materials and supplies (include all accounts and subaccounts).
 - j. Balance in accounts payable applicable to each account in (i) above. (If actual is indeterminable, give reasonable estimate.)

- k. A summary of customer deposits as shown in Format 3 to this request.
- 1. Computation and development of minimum cash requirements.
- m. Balance in accounts payable applicable to amounts included in utility plant in service. (If actual is indeterminable, give reasonable estimate.)
- n. Balance in accounts payable applicable to prepayments by major category or subaccount.
- o. Balance in accounts payable applicable to amounts included in plant under construction. (If actual is indeterminable, give reasonable estimate.)
- 7. Provide the cash account balances at the beginning of the test year and at the end of each month during the test year.
- 8. Provide the following information for each item of water property held for future use at the end of the test year:
 - a. Description of property.
 - b. Location.
 - c. Date purchased.
 - d. Cost.
 - e. Estimated date to be placed in service.
 - f. Brief description of intended use.
 - g. Current status of each project.
- 9. Provide schedules in comparative form showing by month for the test year and the preceding year the balance of each water plant and reserve account or subaccount included in Campbell County's chart of accounts as shown in Format 4.
- 10. Provide the journal entries relating to the purchase of water utility plant acquired as an operating unit or system by purchase, merger, consolidation, liquidation, or otherwise since

the inception of Campbell County. Also, a schedule showing the calculation of the acquisition adjustment at the date of purchase of each item of utility plant, the amortization period, and the unamortized balance at the end of the test year.

- 11. Provide the detailed workpapers showing calculations supporting all accounting, pro forma, end-of-period, and proposed rate adjustments in the rate application to revenue, expense, investment and reserve accounts for the test year, and a complete detailed narrative explanation of each adjustment, including the reason why each adjustment is required. Explain in detail all components used in each calculation, including the methodology employed and all assumptions applied in the derivation of each adjustment. Index each calculation to the accounting, pro forma, end-of-period, and proposed rate adjustment which it supports.
- 12. Provide a schedule showing a comparison of the balance in the revenue accounts for each month of the test year to the same month of the preceding year for each revenue account or subaccount included in Campbell County's chart of accounts. Include appropriate footnotes to show the month each rate increase was granted and the month the full increase was recorded in the accounts. See Format 4.
- 13. a. Provide a schedule showing a comparison of the balance of the operating expense accounts for each month of the test year to the same month of the preceding year for each account or subaccount included in Campbell County's chart of accounts. See Format 4.

- b. Provide a schedule in comparative form showing the operating expense account balance for the test year and each of the 5 years preceding the test year for each account or subaccount included in Campbell County's annual report. Show the percentage of increase of each year over the prior year.
- c. Provide a schedule of salaries and wages for the test year and each of the 5 calendar years preceding the test year as shown in Format 5 to this request. Show for each time period the amount of overtime pay.
- d. Provide a schedule showing the percentage of increase in salaries and wages for both union and non-union employees for the test year and the 5 preceding years.
- 14. a. Provide a schedule of franchise fees paid to cities, towns, or municipalities during the test year, including the basis of these fees.
- b. Provide an analysis of test-year other operating taxes in the format as shown in attached Format 6.
- 15. Provide a statement of water plant in service for the test year. This data should be presented as shown in Format 7 to this request.
 - 16. Provide the following information:
- a. A detailed analysis of all charges booked during the test period for advertising expenditures. This analysis should include a complete breakdown of Account 913 Advertising Expenses, as shown in Format 8 attached and further should show any other advertising expenditures included in any other expense

accounts. The analysis should be specific as to the purpose of the expenditure and the expected benefit to be derived.

b. An analysis of Account 930 - Miscellaneous General Expenses for the test period. This analysis should show a complete breakdown of this account as shown in attached Format 9 and further provide all detailed working papers supporting this analysis. At a minimum, the workpapers should show the date, vendor, reference (i.e., voucher no., etc.), dollar amount, and brief description of each expenditure. Detailed analysis is not required for amounts of less than \$500 provided the items are grouped by classes as shown in Format 9 attached.

- c. An analysis of Account 426 Other Income Deductions for the test period. This analysis should show a complete breakdown of this account as shown in attached Format 10 and further provide all detailed working papers supporting this analysis. At a minimum, the workpapers should show the date, vendor, reference (i.e., voucher no., etc.), dollar amount, and brief description of each expenditure. Detailed analysis is not required for amounts of less than \$500 provided the items are grouped by classes as shown in Format 10 attached.
- 17. Provide a detailed analysis of expenses incurred during the test year for professional services, as shown in Format 11, and all working papers supporting the analysis. At a minimum, the working papers should show the payee, dollar amount, reference (i.e., voucher no., etc.), account charged, hourly rates and time charged to the company according to each invoice, and a description of the service provided.

- 18. Provide a detailed analysis of contributions for charitable and political purposes (in cash or services), if any, recorded in accounts other than Account 426. This analysis should indicate the amount of the expenditure, the recipient of the contribution, and the specific account charge.
- 19. a. Describe Campbell County's lobbying activities. Include with this description a schedule listing the name of each lobbyist, his salary, the organizations or trade associations of which he is a member, all paid or reimbursed expenses or allowances, and the account(s) charged for all its lobbying activities on the local, state, or national level.
- 20. Provide the following information with regard to uncollectible accounts for the test year and 5 preceding calendar years:
 - a. Reserve account balance at the beginning of the year.
 - b. Charges to reserve account (accounts charged off).
 - c. Credits to reserve account.
 - d. Current year provision.
 - e. Reserve account balance at the end of the year.
 - f. Percent of provision to total revenue.
- 21. Provide a detailed analysis of the retained earnings account for the test period and the 12-month period immediately preceding the test period.
- 22. a. Provide a listing of non-utility property and property taxes and accounts where amounts are recorded.

- b. Provide a schedule for all non-utility property giving a description, the date purchased, and the cost.
 - 23. Provide the employee data in Format 12 attached.
- 24. Provide a calculation of the rate or rates used to capitalize interest during construction for the test year and the 3 preceding calendar years. Provide a narrative explanation of each component entering into the calculation of this rate.
- 25. Provide the information, as soon as it is known, which would have a material effect on net operating income which occurred after the test year and was not incorporated in the filed exhibits.
- 26. Provide a detailed monthly income statement for each month after the test period, including the month in which the hearing ends, as they become available.
- 27. Provide a listing of present or proposed research efforts dealing with the pricing of water and the current status of such efforts.
- 28. Provide a schedule reflecting the salaries and other compensation of each executive officer for the test year and the preceding 2 calendar years. Include the annual percentage increase and the effective date of each increase, the job title, duty and responsibility of each officer, the number of employees who report to each executive officer and to whom each executive officer reports. Also, for employees elected to executive officer status during the test year, provide the salaries, for the test year, for those persons whom they replaced.

- 29. Provide an analysis of the expenses for research and development activities for the test year and the 5 preceding calendar years. For the test year include the following details:
 - a. Basis of fees paid to research organizations.
- b. Details of the research activities conducted by each organization.
- c. Details of services and other benefits provided by each organization during the test year.
 - d. Details of the expected benefits to the company.
- 30. Provide the average number of customers for each customer class (i.e., residential, commercial, and industrial) for the test period and for each month of the test period.
- 31. Provide the names and mailing addresses of each of Campbell County's commissioners.
- 32. Provide any current labor contracts and the most recent contracts previously in effect.

Done at Frankfort, Kentucky, this 22nd day of August, 1989.

PUBLIC SERVICE COMMISSION

For the Commission

ATTEST:

Case No. 89-029

SCHEDULE OF OUTSTANDING LONG-TERM DEBT For the Test Year Ended December 31, 1988

		Date	Date		Coupon	Cost	Cost	Bond Rating	Type	Annualized
Line	Type of	of	of	Amount	Interest		Rate to		of	Cost
No.	Debt Issue	Issue	Maturity	Outstanding	Rate_1	At Issue	Maturity3	of Issue	Obligation	Col.(d)xCol.(q)
	(A)	(b)	(c)	(d)	(e)	(£)	(g)	(h)	(i)	(5)

Total Long-Term Debt and Annualized Cost

Annualized Cost Rate [Total Col. (j) - Total Col.(d)]

- 1 Nominal Rate
- Nominal Rate Plus Discount or Premium Amortization
- 3 Nominal Rate Plus Discount or Premium Amortization and Issuance Cost
- Standard and Poor's, Moody, etc.

Case No. 89-029

SCHEDULE OF OUTSTANDING LONG-TERM DEBT For the Test Year Ended December 31, 1988

		Data	Data		Coupon	Cost	Cost	Bond Rating	Туре	Annualized	Actual Test Year
Line	Type of	of Tana	of	Amount	Interest	Rate	Rate to	At Time	of	Cost Col.(d)xCol.(g)	Interest
No.	Debt Issue (a)	(p)	(C)	Outstanding (d)	(0)	(£)	(g)	(h)	(1)	(t)	(k)

Total Long-Term Debt and Annualized Cost

Annualized Cost Rate [Total Col. (j) - Total Col.(d)]

Actual Long-Term Debt Cost Rate [Total Col. k - Total Reported in Col. (c) Line 15 of Format 1, Schedule 2]

¹ Nominal Rate

Nominal Rate Plus Discount or Premium Amortization

Nominal Rate Plus Discount or Premium Amortization and Issuance Cost

⁴ Standard and Poor's, Moody, etc.

⁵ Sum of Accrued Interest Amortization of Discount or Premium and Issuance Cost

Case No. 89-029

SCHEDULE OF SHORT-TERM DEBT For the Test Year Ended December 31, 1988

		Date	Date		Nominal	Effective	Annualized
Line	Type of Debt	of	of	Amount	Interest	Interest	Interest Cost
No.	Instrument	Issue	Maturity	Outstanding	Rate	Cost Rate	$Col.(d) \times Col.(f)$
	(a)	(b)	(c)	(d)	(•)	(f)	(g)

Total Short-Term Debt

Annualized Cost Rate [Total Col. (g) - Total Col.(d)]

Actual Interest Paid or Accured on Short Term

Debt during the Test Year [Report in Col. (g) of this schedule]

Average Short-Term Debt - Format 1, Schedule 2 Line 15 Col. (d) [Report in Col. (g) of this schedule]

Test Year Interest Cost Rate [Actual Interest - Average Short-Term Debt] [Report in Col. (f) of this schedule]

Instructions:

1. In all instances where the Effective Interest Cost Rate is different from the Nominal Interest Rate provide a calculation of the effective Interest Cost Rate in sufficient detail to show the items of costs that cause the difference.

Case No. 89-029

ANALYSIS OF WATER SALES AND PRODUCTION

Line lst 3rd 7th 8th 10th 11th 12th 2nd 4th 5th 6th 9th Month Month Month No. Month Month Month Month Month Month Month

- Water Sales (thousand gals.)
- 2. Residential
- 3. Commercial
- 4. Industrial
- 5. Fire Service
- 6. Other
- 7. Total Water Sales
- System Delivery (thousand gals.)
- 9. Water Produced
- 10. Water Purchased
- 11. Total System Delivery

Case No. 89-029

ANALYSIS OF CUSTOMERS AND REVENUE

6th 7th 8th 9th 10th 11th 12th Line lst 2nd 3rd 4th 5th Month No.

- 1. Number of Customers
- 2. Residential
- 3. Commercial
- 4. Industrial
- 5. Fire Service
- 6. Other
- 7. Total Number of Customers
- 8. Water Revenue
- 9. Residential
- 10. Commercial
- 11. Industrial
- 12. Fire Service
- 13. Other
- 14. Total Water Revenue

Case No. 89-029

SUMMARY OF CUSTOMER DEPOSITS

Line No.	Month Receipts Refunds Balance (b) (C)
1.	Balance beginning of test year
2.	1st Month
3.	2nd Month
4.	3rd Month
5.	4th Month
6.	5th Month
7.	6th Month
8.	7th Month
9.	8th Month
10.	9th Month
11.	10th Month
12.	11th Month
13.	12th Month
14.	Total (L1 through L13)
15.	Average Balance (L14 - 13)
16.	Amount of deposits received during test period
17.	Amount of deposits refunded during test period
18.	Number of deposits on hand end of test year
19.	Average amount of deposit (L15, Column (d) - L18)
20.	Interest paid during test period

Case No. 89-029

COMPARISON OF TEST YEAR ACCOUNT BALANCES WITH THOSE OF THE PRECEDING YEAR

Account Title and 1st 2nd 3rd 4th 5th 6th 7th 8th 9th 10th 11th 12th
Account Number Month Total

Test Year Prior Year Increase (Decrease)

Case No. 89-029

ANALYSIS OF SALARIES AND WAGES

For the Calendar Years 1983 Through 1987 And the Test Year

						12_M	onthe Ende	d				
				Calenda	r years Pr	ior to	o Test Yea	r	-		T	st
Line		5th		l th	3 r	:d	2nd		lst		Ye	ar
No.	<u> Item</u>	Amount 1	Amoun	<u> </u>	Amount	1	Amount	1	Amount	3	Amount	
	(A)	(b) (c) (<u>d</u>)	(e)	(£)	(g)	(h)	(1)	(5)	(k)	(1)	(m)

- 1. Wages charged to expense:
- 2. Source of Supply
 - (a) operation
 - (b) maintenance
- 3. Pumping
 - (a) operation
 - (b) maintenance
- 4. Transmission and Distribution
 - (a) operation
 - (b) maintenance
- 5. Customer accounts expense
- 6. Sales expenses
- 7. Administrative and general expenses:
 - (a) Administrative and general salaries
 - (b) Office supplies and expense
 - (c) Administrative expense transferred-cr.
 - (d) Outside services employed
 - (e) Property insurance
 - (f) Injuries and damages

Format 5
Page 2 of 2

				12 N	onths Ended		
			Calendar	years Prior to	Test Year		Test
Line		5th	4th	3rd	2nd	lst	Year
No.	<u> Item</u>	Amount \$	Amount 4	Amount 1	Amount \$	Amount 1	Amount 1
	(a)	(b) (c)	(d) (e)	(f) (g)	(h) (i)	(j) (k)	(1) (m)

- 7. Administrative and general expenses (continued):
 - (g) Employees pensions and benefits
 - (h) Franchise requirements
 - (i) Regulatory commission expenses
 - (j) Duplicate charges-cr.
 - (k) Miscellaneous general expense
 - (1) Rents
 - (m) Maintenance of general plant
- .8. Total administrative and general expenses L7(a) through L7(m)
- 9. Total salaries and wages charged expense (L2 through L6 + L8)
- 10. Wages capitalized
- 11. Total Salaries and wages
- 12. Ratio of salaries and wages charged expense to total wages (L9 : L11)
- 13. Ratio of salaries and wages capitalized to total wages (L12 L13)

Note: Show percentage increase of each year over the prior year in Columns (c), (e), (g), (i), (k), and (m).

Case No. 89-029

ANALYSIS OF OTHER OPERATING TAXES For the Test Year Ended December 31, 1988

Line			Charged to	Charged to		Amount
No.	<u>Item</u>	Charged Expense	Construction	Other Accounts	Amount Accrued	Paid
		(a)	(b)	(c)	(d)	(e)

- 1. Kentucky Retail:
 - (a) State Income
 - (b) Gross Receipts*
 - (c) Ad Valorem (Property)
 - (d) Payroll (Employer's Portion)
 - (e) Other Taxes
- 2. Total Kentucky Retail [L1(a) through L1(d)]
- 3. Other Jurisdictions

Total Per Books (L2 + L3)

Instructions:

*Actual payments for test year should be shown under the amount paid column.

1. Explain items in column (c).

Case No. 89-029

STATEMENT OF WATER PLANT IN SERVICE

For the Test Year Ended December 31, 1988

Accou Numbe	•••	Beginning Balance (b)	Additions (c)	Retirements (d)	Transfers (e)	Ending Balance (f)
301.	Organization					
302.						
303.	Miscellaneous Intangible Plant					
	Sources of Supply Plant					
310.	Land and Land Rights					
311.	_					
312.	Collecting and Impounding Reservoirs					
313.	Lake, River and Other Intakes					
314.	Wells and Springs					
315.	Infiltration Galleries and Tunnels					
316.	Supply Mains					
317.	Other Water Source Plant					

Pumping Plant

320. Land and Land Right	320.	Land	and	Land	Ric	ahtı
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- 321. Structures and Improvements
- 322. Boiler Plant Equipment
- 323. Other Power Production Equipment

					She	Format 7 et 2 of 2
Accou	Title of Account	Beginning Balance	Additions	Retirements	Transfers	Ending Balance
	(a)	(p)	(c)	(a)	(●)	(£)
324.	Steam Pumping Equipment					
325.	Electric Pumping Equipment					
	Diesel Pumping Equipment					
	Hydraulic Pumping					
328.	Other Pumping Equipment					
	Water Treatment Plant					
330.	Land and Land Rights					
331.	Structures and Improvements					
332.	Water Treatment Equipment					
	Transmission and Distribution Plant	ant				
340.	Land and Land Rights					
341.	Structures and Improvements					
342.	Distribution Reservoirs and Standpipe	8				
343.	Transmission and Distribution Mains					
344.	Fire Mains					
	Services					
	Meters					
	Meter Installations					
	Hydrants	_				
349.	Other Transmission and Distribution P	lant				
	General Plant					
389.	Land and Land Rights					
	Structures and Improvements					
	Office Furniture and Equipment					
392.	Transportation Equipment					

393. Stores Equipment

395. Laboratory Equipment

396. Power Operated Equipment 397. Communication Equipment 398. Miscellaneous Equiment 399. Other Tangible Property

394. Tools, Shop and Garage Equipment

Case No. 89-029

ACCOUNT 913 - ADVERTISING EXPENSE

Line		Sales or					
<u>No</u>	Item	Promotional Advertising	Institutional Advertising		Kate Case	Other	Total
	(a)	(b)	(c)	(d)	<u>(e)</u>	(£)	(g)

- 1. Newspaper
- 2. Magazines and Other
- 3. Television
- 4. Radio
- 5. Direct Mail
- 6. Sales Aids
- 7. Total

CASE NO. 89-029

ACCOUNT 930 - MISCELLANEOUS GENERAL EXPENSES

Line	Item	Amount
No.	(a)	<u>(p)</u>

- 1. Industry Association Dues
- 2. Debt Servicing Expenses
- 3. Institutional Advertising
- 4. Conservation Advertising
- 5. Rate Department Load Studies
- 6. Water, and Other Testing and Research
- 7. Commissioners' Fees and Expenses
- 8. Dues and Subscriptions
- 9. Miscellaneous
- 10. Total

Case No. 89-029

ACCOUNT 426 - MISCELLANEOUS INCOME DEDUCTIONS

Line No.	<u>Item</u> (a)	Amount (b)
1.	Donations	
2.	Civic Activities	
3.	Political Activities	
4.	Other	
5.	Total	

CASE NO. 89-029

PROFESSIONAL SERVICE EXPENSES

Line No.	<u>Item</u>	Rate Case	Annual Audit	<u>Other</u>	<u>Total</u>
1.	Legal				
2.	Engineering				
3.	Accounting				
4.	Other				
5.	Total				

Case No. 89-029

SCHEDULE OF NUMBER OF EMPLOYEES, HOURS PER EMPLOYEE, AND AVERAGE WAGES PER EMPLOYEE

Calendar Years Prior to	Source of Supply	W	ater Treatme	ent	Transmission and Distribution	Customer Accounts and Sales
Test Year	No. Hrs. Wages	No.	Ars.	Wages	No. Hrs. Wages	No. Hrs. Wages
(A)	(B) (C) (D)	(E)	(F)	(G)	(H) (I) (J)	(K) (L) (M)
5th Year						
% Change						
4th Year						

3rd Year

Change

\$ Change

2nd Year

Change

1st Year

• change

Test Year

♦ Change

Total

Mo. Hrs. (T) (U)

Hrs. Wages

(V)

Calendar Years Prior to Test Year (A)
5th Year
% Change
4th Year
% Change
3rd Year
% Change
2nd Year
Change
lst Year
• change
Test Year

& Change

NOTE: (1) Where an employee's wages are charged to more than one function include employee in function receiving largest portion of total wages.

Construction

Hrs.

(R)

No.

(Q)

Wages

(8)

Administrative

and General

No. Hrs. Wages

(P)

(N) (O)

- (2) Show percent increase (decrease) of each year over the prior year on lines designated above "% Change."
- (3) Employees, weekly hours per employee, and weekly wages per employee for the week including December 31, of each year and the last day of the test year.